

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

21-CV-2008 (KAM)

- against -

RICHARD DALE STERRITT, JR.
(a/k/a RICHARD RICHMAN),
MICHAEL G. GREER,
DEANNA L. LOONEY,
ROBERT W. MAGNESS, JR.,
KATIE MATHEWS,
JAMES CHRISTOPHER PITTMAN, and
MARK ROSS,

Defendants,

-and-

NAOMI ROSS,
ROBYN L. STRAZA,
ANGELIKI (a/k/a ANGIE) TOUHOULIOTIS, and
RAINMAKER ADVISORS, LLC,

Relief Defendants.

-----X

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Government's Memorandum of Law in Support of Application To Intervene and To Stay Civil Proceedings, the United States will move this Court on a date and time to be designated by the Court, before the Honorable Kiyo A. Matsumoto, United States District Judge, at the United States Federal Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, pursuant to Rule 24 of the

Federal Rules of Civil Procedure, for intervention for the purpose of seeking a stay of civil proceedings, and for such other relief as the Court deems appropriate.

Dated: Brooklyn, New York
May 19, 2021

Respectfully submitted,

MARK J. LESKO
Acting United States Attorney

/s/ David C. Pitluck
David C. Pitluck
Michael Robotti
Assistant U.S. Attorneys
(718) 254-7000

Cc: Clerk of the Court (KAM) (By ECF)
All Counsel (By ECF)